

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

HAAS OUTDOORS, INC.

Plaintiff,

v.

DRYSHOD INTERNATIONAL, LLC,
AND JAMES K. DONOHUE

Defendants.

§
§
§
§
§
§
§
§
§
§

C.A. NO. 1:18-cv-00978-RP
[LEAD CASE]

DRYSHOD INTERNATIONAL, LLC,
AND JAMES K. DONOHUE

Plaintiffs,

v.

HAAS OUTDOORS, INC.,

Defendant.

§
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§

C.A. NO. 1:18-cv-00596-RP
[CONSOLIDATED]

PLAINTIFF'S NOTICE TO THE COURT

EXHIBIT D

Plaintiff's Deposition Witness Designations

**IN THE UNITED STATES DISTRICT COURT
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AUSTIN DIVISION**

HAAS OUTDOORS, INC.	§	
	§	
Plaintiff,	§	C.A. NO. 1:18-cv-00978-RP
	§	[LEAD CASE]
v.	§	
	§	
DRYSHOD INTERNATIONAL, LLC,	§	
AND JAMES K. DONOHUE	§	
	§	
Defendants.	§	

DRYSHOD INTERNATIONAL, LLC,	§	
AND JAMES K. DONOHUE	§	
	§	C.A. NO. 1:18-cv-00596-RP
Plaintiffs,	§	[CONSOLIDATED]
	§	
v.	§	
	§	
HAAS OUTDOORS, INC.,	§	
	§	
Defendant.	§	

PLAINTIFF’S DEPOSITION WITNESS DESIGNATIONS

Pursuant to Local Rule CV-16(f)(6) and the Court’s June 30, 2021 Order (Dkt. #257), Plaintiff Haas Outdoors, Inc. (“Haas Outdoors”) states that all of the depositions that it otherwise might use are from will-call witnesses. The parties have agreed, with the Court’s permission, to a procedure for the calling of witnesses and designating of deposition testimony in the unlikely event that a witness not appear in person (Dkt. #261).

Dated: September 30, 2021.

Respectfully submitted,

HAAS OUTDOORS, INC.

By Its Attorneys,
JONES WALKER LLP

By: s/ W. Whitaker Rayner
W. WHITAKER RAYNER

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